

1 HONORABLE DAVID G. ESTUDILLO
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7 UNITED STATES DISTRICT COURT
8 FOR THE WESTERN DISTRICT OF WASHINGTON
9 AT TACOMA

10 JANICE HENNESSEY,

11 Plaintiff,

12 v.

13 AMERICREDIT FINANCIAL SERVICES, INC.
14 DBA GM FINANCIAL, HOBLIT AUTOMOTIVE,
15 INC. DBA HOBLIT CHEVROLET GMC AND
16 HOBLIT BUICK GMC,

Defendants.

NO. 3:24-CV-05145-DGE

**STIPULATED MOTION AND
PROPOSED ORDER TO
EXTEND TIME TO RESPOND
TO MOTION FOR RELIEF**

Noted for: September 26, 2024

STIPULATED MOTION

COME NOW, the parties, by and through their counsel of record, and submit the following stipulated motion and proposed order to extend the time for defendants to file a Response to Plaintiff's Motion for Relief from Order and Judgment & Request for Indicative Ruling Under Rule 62.1(A) (Dkt. #54). The Motion is noted for October 4, 2024, making the current deadline for defendants to file a Response September 30, 2024. The parties stipulate and request the deadline be extended 14 days to October 15, 2024 (due to the Federal Court holiday on October 14, 2024). The grounds for this motion are as follows:

STIPULATED MOTION AND PROPOSED
ORDER TO EXTEND TIME TO RESPOND
TO MOTION FOR RELIEF (3:24-CV-05145-DGE) - 1

**BAKER STERCHI COWDEN
& RICE, LLC**
2100 WESTLAKE AVENUE N., SUITE 206
SEATTLE, WA 98109
206-957-9669

1. Plaintiff's Motion for Relief from Order and Judgment & Request for Indicative
2 Ruling Under Rule 62.1(A) (Dkt. #54) consists of 30 pages and is supported by 23 exhibits.

3. Plaintiff's motion contains new legal allegations based on allegedly newly-found
4 evidence. Investigation of these new claims will require additional time and resources.

5. Additional time to respond to plaintiff's Motion would be beneficial to defendants
6 and the Court, as it will allow defendants to fully investigate the claims and prepare a full and
7 complete response to this new information and new claims.

8 For the reasons set forth above, defendants respectfully request that they be granted an
9 extension until and including October 15, 2024 to file a Response to Plaintiff's Motion for Relief
10 from Order and Judgment & Request for Indicative Ruling Under Rule 62.1(A). Plaintiff agrees
11 to this request and courteously joined in this motion.

12 IT IS SO STIPULATED this 26th day of September, 2024.

13 BAKER STERCHI COWDEN & RICE,
14 LLC

CAIRNCROSS & HEMPELMANN

15 By: s/ Robert L. Christie
16 ROBERT L. CHRISTIE, WSBA #10895
17 MEGAN M. COLUCCIO, WSBA #44178
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23 I certify that this memorandum contains 248
24 words, in compliance with the Local Civil
Rules.

25 *[Signatures continued on following page]*

26 STIPULATED MOTION AND PROPOSED
ORDER TO EXTEND TIME TO RESPOND
TO MOTION FOR RELIEF (3:24-CV-05145-DGE) - 2

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4 Pro Se Plaintiff
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ORDER

9 Based upon the foregoing Stipulation,
10
11 IT IS HEREBY ORDERED, ADJUDGED AND DECREED that the deadline for
12 defendants to file a Response to Plaintiff's Motion for Relief from Order and Judgment &
13 Request for Indicative Ruling Under Rule 62.1(A) is extended until and including October 15,
14 2024.
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DATED this 26th Day of September 2024.

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20 Presented By:
21 BAKER STERCHI COWDEN & RICE, LLC
22 By: s/ Robert L. Christie
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